

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

ROOSEVELT ROAD RE, LTD.; TRADESMAN
PROGRAM MANAGERS, LLC; and IONIAN RE, LLC

Plaintiffs,

v.

LIAKAS LAW, P.C.; DEAN N. LIAKAS; JOHN DOE
NOS. 1-25; XYZ CORPORATION NOS. 1-25;
BROOKLYN MEDICAL PRACTICE, P.C.; SAYEEDUS
S. SALEHIN, M.D.; ADVANCED ORTHOPEDICS
AND JOINT PRESERVATION P.C.; STAN
AVSHALUMOV, D.O.; COMMUNITY MEDICAL
IMAGING OF BROOKLYN P.C.; ANDREW J.
MCDONNELL, M.D.; ORTHOPAEDICS SPINE &
SPORTS MEDICINE, LLC, s/d/b/a TOTAL
ORTHOPAEDICS & SPORTS MEDICINE; VADIM
LERMAN, D.O.; ABHISHEK KUMAR, M.D.;
SHIVEINDRA JEYAMOHAN, M.D.; BIG APPLE PAIN
MANAGEMENT, P.L.L.C.; RICHARD APPLE, M.D.;
NORTH SHORE FAMILY CHIROPRACTIC, P.C.;
TODD LAWRENCE LEBSON, D.C.; UNICORN
ACUPUNCTURE, P.C.; DEKUN WANG, L.Ac;
ENGLINTON MEDICAL, P.C.; SHIARREE
EVARISTO, P.T.; ARKADIY SHUSTERMAN, D.O.;
COUNTER POINT MEDICAL, P.C.; UPWARD
MEDICAL, P.C.; MARK KOSTIN, M.D.; BROOKLYN
PREMIER ORTHOPEDICS AND PAIN
MANAGEMENT P.L.L.C.; FJ ORTHOPAEDICS AND
PAIN MANAGEMENT P.L.L.C.; VAGMIN VORA,
M.D.; JONATHAN SIMHAE, M.D.; STEVEN
HOROWITZ, M.D.; BL PAIN MANAGEMENT,
P.L.L.C. d/b/a PAIN MANAGEMENT NYC; PAIN
PHYSICIANS NY, P.L.L.C.; BOLES LAV
KOSHARSKYY, M.D.; ROMAN SHULKIN, M.D.;
LEONID REYFMAN, M.D.; MCCULLOCH
ORTHOPAEDIC SURGICAL SERVICES, P.L.L.C.
s/d/b/a NEW YORK SPORTS AND JOINTS
ORTHOPAEDIC SPECIALISTS; KENNETH
McCULLOCH-OTERO, M.D.; DAVID R. CAPIOLA,
M.D.; GOTHAM NEUROSURGERY, P.L.L.C.;
ANDERS COHEN, D.O.; GARDEN STATE
ORTHOCARE LLC, d/b/a ORTHOCARE SURGICAL;
RANDALL EHRLICH, M.D.; PRECISION PAIN
MANAGEMENT, P.C.; and ARI BENJAMIN LERNER
M.D.,

Defendants.

Case No. 1:25-cv-00300-ENV-RML

DECLARATION OF SERVICE

JAMES M. CATTERSON declares the following to be true and correct under penalty of perjury under the laws of the United States of America:

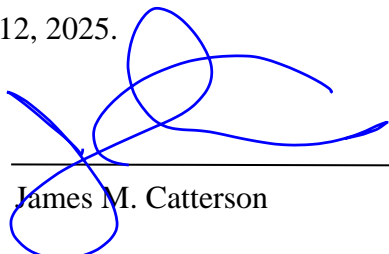
1. I am a member of the Bar of this Court and a partner at Pillsbury Winthrop Shaw Pittman LLP, attorneys for Defendants Liakas Law, P.C., and Dean N. Liakas (hereinafter referred to as “Liakas Law”) in this action.

2. On May 9, 2025, I caused to be served a copy of Liakas Law’s Letter proposing a joint briefing schedule (Dkt. No. 100) via overnight FedEx on the following individuals and/or entities:

- a. Vadim Lerman, D.O. at 1789 Sheepshead Bay Rd, Brooklyn, New York 11235
- b. Abhishek Kumar, M.D. at 1789 Sheepshead Bay Rd, Brooklyn, New York 11235
- c. Shiveindra Jeyamohan, M.D. at 1789 Sheepshead Bay Rd, Brooklyn, New York 11235
- d. Precision Pain Management, P.C. at 161-10 Jamaica Ave, Ste 301, Jamaica, New York 11432
- e. Ari Benjamin Lerner, M.D. at 25-15 Crescent St, Astoria, New York 11102

3. Attached hereto as **Exhibit A** are true and correct copies of the FedEx delivery confirmations, demonstrating that the FedEx packages were delivered to Vadim Lerman, D.O., Abhishek Kumar, M.D., Shiveindra Jeyamohan, M.D., Precision Pain Management, P.C., and Ari Benjamin Lerner, M.D., on May 12, 2025.

Executed in New York, New York on May 12, 2025.



James M. Catterson